

EXHIBIT A

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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

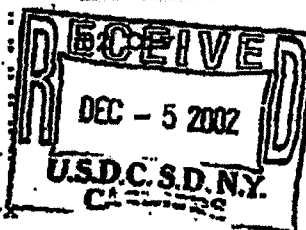
UNITED STATES OF AMERICA,

 Plaintiff,

 - v. -
 CITY OF NEW YORK,

 Defendant.

COMPLAINT



Plaintiff UNITED STATES OF AMERICA, by its attorney
 JAMES B. COMEY, United States Attorney for the Southern District
 of New York, on behalf of the United States Environmental
 Protection Agency ("EPA"), for its complaint against defendant
 herein alleges as follows:

NATURE OF THE ACTION

1. This is a civil action brought pursuant to section
 9006 of the Resource Conservation and Recovery Act, as amended,
 ("RCRA"), 42 U.S.C. § 6991e, for civil penalties and injunctive
 relief against the defendant City of New York (the "City" or
 "defendant"). This action seeks redress for the City's
 violations of requirements under RCRA and the regulations
 promulgated thereunder, codified at 40 C.F.R. part 280, regarding